# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PRADEEP MAHAPATRA, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG,

Defendant.

ROBERT M. HODGE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

FUQI INTERNATIONAL, INC., YU KWAI CHONG, and CHING WAN WONG,

Defendants.

Civil Action No.: 10-civ-02515

**CLASS ACTION** 

Civil Action No.: 10-civ-02544

**CLASS ACTION** 

[Caption Continued on Following Page]

DECLARATION OF REED R. KATHREIN IN SUPPORT OF THE FUQI INVESTOR GROUP'S MOTION TO CONSOLIDATE RELATED CASES, TO APPOINT THE FUQI INVESTOR GROUP AS LEAD PLAINTIFF, AND TO APPROVE THE SELECTION OF LEAD COUNSEL

THOMAS MARKEY, Individually and On Behalf Civil Action No.: 10-civ-2556 of All Others Similarly Situated, **CLASS ACTION** Plaintiff, VS. FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG, Defendants. X JOEL A. HOFFLICH, Individually and On Behalf Civil Action No.: 10-civ-02610 of All Others Similarly Situated, **CLASS ACTION** Plaintiff, VS. FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG, Defendants. X CARLTON COWIE, Individually and On Behalf of Civil Action No.: 10-civ-02611 All Others Similarly Situated, **CLASS ACTION** Plaintiff, VS. FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG, Defendants.

[Caption Continued on Following Page]

HAI RONG YANG, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG,

Defendants.

FUCHSBERG INVESTMENT PARTNERS, Individually and On Behalf of All Others Similarly Situated,

Plaintiffs,

VS.

FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG,

Defendants.

TAMY DEE THOMPSON, Individually and On Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG,

Defendants.

[Caption Continued on Following Page]

Civil Action No.: 10-civ-02654

**CLASS ACTION** 

Civil Action No.: 10-civ-02639

**CLASS ACTION** 

X

X X

Civil Action No.: 10-civ-02640

**CLASS ACTION** 

HARRY POGASH, Individually and On Behalf of Civil Action No.: 10-civ-02885 All Others Similarly Situated, **CLASS ACTION** Plaintiff, VS. FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG. Defendants. X SIDNEY and ELAINE GLICK, Individually and Civil Action No.: 10-civ-03007 On Behalf of All Others Similarly Situated, **CLASS ACTION** Plaintiffs, VS. FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG, Defendants. X X MICHAEL D. COOPER, JR., Individually and On Civil Action No.: 10-civ-03024 Behalf of All Others Similarly Situated, **CLASS ACTION** Plaintiff, VS. FUQI INTERNATIONAL, INC., YU KWAI CHONG, CHING WAN WONG, Defendants.

#### I, REED R. KATHREIN, declare as follows:

- 1. I am a member in good standing of the state bar of California. I am an attorney at Hagens Berman Sobol Shapiro LLP, proposed Lead Counsel for proposed Lead Plaintiffs Michael Manicone, Anthony Pope, and Gregory Needham (collectively the "Fuqi Investor Group"). I submit this declaration in support of the Fuqi Investor Group's Motion to Consolidate Related Cases, to Appoint the Fuqi Investor Group as Lead Plaintiff, and to Approve the Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
  - 2. Attached as exhibits are true and correct copies of the following:

Exhibit A: Published Notice of the first securities class action complaint filed in this matter in the United States District Court for the Southern District of New York;

Exhibit B: Charts of the Fuqi Investor Group's purchases and sales;

Exhibit C: Certifications of the Fuqi Investor Group along with detailed listings of transactions;

Exhibit D: Joint Declaration in Support of the Fuqi Investor Group's Motion for Appointment as Lead Plaintiff and Approval of Lead Plaintiff's Selection of Lead Counsel; and

Exhibit E: Firm Résumé for Proposed Lead Counsel Hagens Berman Sobol Shapiro LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of May, 2010, at Berkeley, California.

/s/ Reed R. Kathrein	
REED R. KATHREIN	

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/	
DAVID S. NALVEN	

## Mailing Information for a Case 1:10-cv-02515-DAB

### **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- Marvin Lawrence Frank mfrank@murrayfrank.com
- Leigh R. Lasky lasky@laskyrifkind.com
- Brian Philip Murray bmurray@murrayfrank.com
- Joseph Harry Weiss jweiss@weisslurie.com,infony@weisslurie.com

### **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

• (No manual recipients)